



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

DEC 12 2014

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Tonia Downs
FirstEnergy Corporation
800 Cabin Hill Drive C109
Greensburg, PA. 15601

Re: Requirement to provide records/information relevant to the operation and maintenance of the Fort Martin Power Plant

Plant Identification (AFS): #5406100001
Fort Martin Power Plant, Maidsville, WV

Dear Ms. Downs:

EPA is issuing this information request pursuant to Section 114(a) of the Act, 42 U.S.C. § 7414 et seq. Section 114(a) authorizes EPA to require any person who owns and/or operates an emission source to provide information for the purpose of determining whether such person is in violation of any provision of the Act. The Administrator has delegated this authority to the Director of the Air Enforcement Division. In order for EPA to determine whether a violation has occurred, you are hereby required to provide responses to the enclosed questions and requests for information regarding the Fort Martin Power Plant. Your response to this information request must be certified by a duly authorized officer or agent of FirstEnergy by signing the enclosed Statement of Certification (Enclosure 3) and returning it with your response. All information submitted in response to this information request must be certified as true, correct, accurate, and complete by an individual with sufficient knowledge and authority to make such representations on behalf of FirstEnergy.

Failure to provide the required information may result in the initiation of a civil action pursuant to Section 113(b) of the Act, 42 U.S.C. § 7413(b). In addition, knowingly providing false information in response to this information request may be actionable under Section 113(c) of the Act, 42 U.S.C. § 7413(c), and 18 U.S.C. §§ 1001, 1341. The information you provide may be used by EPA in administrative, civil, and criminal proceedings.

You are entitled to assert a business confidentiality claim, covering all or part of the information that this information request requires, except that no such claim can be made with respect to emission data as defined at 40 C.F.R. § 2.301(a)(2). Any such


business confidentiality claim must be made in accordance with the procedures described at 40 C.F.R. § 2.203(b) and Enclosure 4. EPA will provide the public with information subject to a claim of business confidentiality only in accordance with the procedures set forth at 40 C.F.R. Part 2, subpart B. EPA may provide the public with any information not subject to such a claim without further notice to you. The required submission of information pursuant to Section 114 of the Act is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501 et seq.

EPA requires the owner or operator of Fort Martin Power Plant (FirstEnergy Corporation, Monongahela Power Company, and/or its related entities or affiliates) to submit the information requested in Enclosures 1 through 4 for the Fort Martin Power Plant no later than forty-five (45) calendar days after your receipt of this letter. EPA requires you to report any changes or revisions to the information supplied within seven (7) days after the change or revision is made. This requirement to provide EPA with changed or revised information shall remain in effect until EPA provides you with written notice of its termination. Please submit your response to this request to:

Mr. Shaun Burke
Senior Environmental Engineer
U.S. Environmental Protection Agency
William Jefferson Clinton Building Room 2117C
1200 Pennsylvania Ave NW 20004

If you have any questions regarding this information request, please contact Mr. Burke, at (202) 564-1039.

Sincerely,



Phillip A. Brooks, Director
Air Enforcement Division

Enclosures (4)

cc: William Durham, Division Director, Air Quality, West Virginia DEP
601 57th St SE, Charleston, WV 250304

Gregory Fried, Office of Enforcement and Compliance Assurance, U.S. EPA

ENCLOSURE 1
CAA SECTION 114 INFORMATION REQUEST TO FIRSTENERGY

INSTRUCTIONS

1. Provide a separate narrative response to each question and subpart of a question set forth in the Information Request.
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer identify the person(s) that provided information that was used or considered in responding to that question, as well as each person that was consulted in the preparation of that response.
3. Indicate on each document produced in response to this Information Request, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where documents or information necessary for a response are neither in your possession nor available to you, indicate in your response why such documents or information is not available or in your possession and identify any source that either possesses or is likely to possess such information.

DEFINITIONS

All terms used in this information request will have their ordinary meaning unless such terms are defined in the Act, 42 U.S.C. § 7401, 40 C.F.R. Part 52 (which incorporates the Federally-approved Stated Implementation Plan), other Clean Air Act implementing regulations, or otherwise defined herein.

1. The term "BTU" shall mean the British Thermal Unit of heat.
2. The term "Capital Improvement Project Request" shall mean the documents used by station personnel that serve the purpose of describing projects for equipment and process changes when seeking management approval for a planned expenditure at the station. These documents are also known capital appropriation requests, authorizations for expenditure, work order records, improvement requisition projects or other similar names.
3. The term "Coal-Fired Boiler" or "Unit" shall mean all equipment used for the purpose of generating electricity including, but not limited to, coal handling facilities, boilers,

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ductwork, stacks, turbines, generators, and all ancillary equipment.

4. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hardcopy should also include attachments to or enclosures with any document.
5. The term "Electric Utility Steam Generating Unit" shall have the same meaning as defined at 40 C.F.R. § 60.41a.
6. The term "Fort Martin Power Plant" is the electric generating station located at State Route 53, Maidsville, West Virginia 26541 and owned or operated by Monongahela Power Company and/or any of its affiliated companies or parent companies including but not limited to FirstEnergy Corporation.
7. The term "KWHR" shall mean kilowatt hours of electrical energy.
8. The term "MWHR" shall mean megawatt hours of electrical energy.
9. The term "mmBTU" shall mean million British Thermal Units.
10. The term "NSPS" shall mean the Standards of Performance for New Stationary Sources promulgated at 40 C.F.R. Part 60.
11. The term "PSD/NSR" shall mean the Prevention of Significant Deterioration and the New Source Review preconstruction permitting programs established at CAA subparts C and D and further defined at 40 C.F.R. Parts 51 and 52 and any respective program established under a state implementation plan.

ENCLOSURE 2
CAA SECTION 114 INFORMATION REQUEST TO FIRSTENERGY

The U.S. Environmental Protection Agency ("EPA") is issuing this request for information pursuant to Section 114(a) of the Clean Air Act ("the Act" or CAA), 42 U.S.C. 7414(a), for the purpose of determining whether FirstEnergy is in compliance with the Act, including New Source Review Standards (NSR). Section 114(a) authorizes the Administrator of U.S. EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air Enforcement Division. This information request pertains to FirstEnergy's Fort Martin Power Plant.

Failure to provide the required information may result in the initiation of a civil action pursuant to Section 113(b) of the Act, 42 U.S.C. § 7413(b). In addition, knowingly providing false information in response to this information request may be actionable under Section 113(c) of the Act, 42 U.S.C. § 7413(c), and 18 U.S.C. §§ 1001, 1341. The information you provide may be used by EPA in administrative, civil, and criminal proceedings.

Provide the following information for the Monongahela Power Co., Fort Martin Power Station (Fort Martin or facility) using the instructions and definitions supplied in Enclosures 1-4:

1. For each coal-fired generating unit at the facility submit:
 - a. the emission unit identification number;
 - b. the date or year commercial operation began;
 - c. the Contract Data Sheet for each boiler;
 - d. all data contained on the original nameplates for each boiler, each turbine and each generator (a legible photograph of each nameplate would suffice if available);
 - e. all data contained on the current nameplates for each boiler, each turbine and each generator if the nameplates are not original to the equipment or if any information on the nameplates has been changed from the original information (a legible photograph of each nameplate would suffice if available);
 - f. the original design and current maximum generating capacity (MWg/MWn);
 - g. the original design and current maximum heat input capacity (mmBtu/hr);
 - h. the original design and current maximum steam flow output capacity (lbs steam/hr);
 - i. the current operating status of each unit and the applicable date or year for any retired or inactive unit;
 - j. scheduled or planned boiler retirement dates;
 - k. current fuel(s) being fired;
 - l. type of particulate emissions control, year installed, and percentage of time operated per year;
 - m. type of sulfur dioxide emissions control and year installed, and percentage of time operated per year;
 - n. type of nitrogen oxides emissions control and year installed, and percentage of time operated per year; and
 - o. any anticipated emission controls and estimated dates of installation.
2. For each coal-fired generating unit at the facility, provide the following information in an electronic format (Microsoft Excel compatible) on a daily and monthly basis from

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January 1, 2002 through the receipt of this request. If the unit is capable of firing multiple fuels, provide the information requested by questions g. – j. for each type of fuel used.

For each unit provide:

- a. the capacity factor;
- b. the equivalent availability factor;
- c. total gross and net generation (MW-hr);
- d. average heat rate (BTU/KW-hr);
- e. total hours under load; and
- f. the peak hourly generation (MWg) actually achieved during each day and month;

For each fuel burned at each unit, provide

- g. fuel usage (i.e., tons, gallons, etc.);
- h. average heat content (i.e., BTU/lb, BTU/gallon, etc.);
- i. average fuel sulfur content; and
- j. average fuel percent ash.

3. For each coal-fired generating unit at the facility, provide in an electronic format (Microsoft Excel compatible), daily and monthly emissions data for NO_x, SO₂, and CO in both lb/MMBtu and tons per month, from January 1, 2002 to the date of receipt. Describe how these data were determined (CEMS, emission factors, etc.).
4. For each coal-fired generating unit at the facility, provide a list of all projects of an amount greater than \$200,000 approved or completed between January 1, 2009 and the receipt of this request. Include the following information for each Project:
 - a. project work order number;
 - b. project summary/description;
 - c. project commencement or projected commencement date (month and year);
 - d. project completion or projected completion date (month and year);
 - e. authorized project expenditures; and
 - f. actual project expenditures.
5. For Projects either begun or completed between January 1, 2009 and May 31, 2011 for Boiler 1, and between August 1, 2009 and May 31, 2010 for Boiler 2, provide the following:
 - a. all project justification requests or approvals, such as Authorization for Expenditures (AFE), Capital Appropriation Requests (CARs), or similar documents;
 - b. copies of all permits, applicability determinations, and alternative monitoring request approvals, along with supporting information for these projects;
 - c. all reasonable possibility letters or any correspondence with the permitting authority or any party regarding Clean Air Act permitting or applicability related to these projects;
 - d. all other documents related to the intent of the Projects, or the Clean Air Act applicability or requirements related to the Projects. This shall include, but not be

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limited to, memoranda, telephone discussion summaries, meeting minutes, and communications between Monongahela Power Company, FirstEnergy Corp. or any entity related to Monongahela Power Company and FirstEnergy Corp. and the state and/or federal agencies related to all Clean Air Act permitting activities, findings made under the federal or SIP-approved PSD program, SIP-approved minor source construction permitting program, New Source Performance Standards, and federal and state Non-Attainment NSR.

6. For each coal-fired generating unit at this facility, provide an electronic (Microsoft Excel compatible) copy of all Generating Availability Data System (GADS) data (or equivalent) for the period from January 1, 2002, or the date of startup of the unit, whichever is later, to the date of this request. The information should include:
- a. lost generation as a result of forced, maintenance or scheduled outages (in MW-hr);
 - b. duration (in hours) of all outages, deratings, and curtailments;
 - c. start date and time of outage;
 - d. end date and time of outage;
 - e. cause code;
 - f. event type;
 - g. event number; and
 - h. Maximum Net Dependable Capacity (NDC) at the time of the outage or derate.

ENCLOSURE 3
CAA SECTION 114 INFORMATION REQUEST TO FIRST ENERGY

STATEMENT OF CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment.

(Signature)

(Title)

(Date)

ENCLOSURE 4

Confidential Business Information (CBI) Assertion and Substantiation Requirements

A. Assertion Requirements

You may assert a business confidentiality claim covering all or part of the information requested in response to this information request, as provided in 40 C.F.R. § 2.203(b). You may assert a business confidentiality claim covering such information by placing on (or attaching to) the information you desire to assert a confidentiality claim, at the time it is submitted to EPA, a cover sheet, stamped, or typed legend (or other suitable form of notice) employing language such as "trade secret," "proprietary," or "company confidential." Allegedly confidential portions of otherwise non-confidential documents should be clearly identified, and may be submitted separately to facilitate identification and handling by EPA. If you desire confidential treatment only until a certain date or until the occurrence of a certain event, the notice should so state. Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in Section 114(c) of the Clean Air Act (the Act) and 40 C.F.R. Part 2. EPA will construe the failure to furnish a confidentiality claim with your response to the attached letter as a waiver of that claim, and the information may be made available to the public without further notice to you.

B. Substantiation Requirements

All confidentiality claims are subject to EPA verification in accordance with 40 C.F.R. Part 2, subpart B. The criteria for determining whether material claimed as confidential is entitled to such treatment are set forth at 40 C.F.R. §§ 2.208 and 2.301, which provide, in part, that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent; and the disclosure of the information is likely to cause substantial harm to your business's competitive edge.

Pursuant to 40 C.F.R. Part 2, subpart B, EPA may at any time send you a letter asking you to substantiate fully your CBI claim. If you receive such a letter, you must provide EPA with a response within the number of days set forth in the EPA request letter. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential. You must be specific by page, paragraph, and sentence when identifying the information subject to your claim. Any information not specifically identified as subject to a confidentiality claim may be disclosed without further notice to you. For each item or class of information that you identify as being subject to CBI, you must answer the following questions, giving as much detail as possible, in accordance with 40 C.F.R. 2.204(e):

1. What specific portions of the information are alleged to be entitled to confidential treatment? For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question #1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?
7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Any other issue you deem relevant.

Please note that emission data provided under Section 114 of the Act, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2, subpart B. "Emission data" means, with reference to any source of emission of any substance into the air-

(A) Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of any

emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

(B) Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including, to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

(C) A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. §§ 2.301(a)(2)(i)(A), (B) and (C).

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.